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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

KENT HARRIS, individually and on)	Case No. 8:18-cv-02049-JLS-KES
behalf of all others similarly situated,)	
Plaintiff,)	JOINT STIPULATION OF
)	DISMISSAL OF ACTION WITH
vs.)	PREJUDICE AS TO THE NAMED
)	PLAINTIFF AND WITHOUT
)	PREJUDICE AS TO THE
FREEPORT VENTURES, LLC d/b/a)	PUTATIVE CLASS
VALIANT AUTO LLC d/b/a)	
AUTOMOTIVE SERVICES CENTER,)	
and DOES 1 through 10, inclusive, and)	
each of them,)	
)	
Defendant.)	

NOW COME THE PARTIES by and through their attorneys to respectfully move this Honorable Court to dismiss this matter with prejudice as to the named Plaintiff, and without prejudice as to the Putative Class alleged in the complaint, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Each party shall bear their own costs and attorney fees. A proposed order has been concurrently submitted to this Court.

The notice and approval requirements of Federal Rule of Civil Procedure 23(e) are inapplicable to the parties' settlement and dismissal of this putative

1 class action because this action has not been certified as a class.¹ Per the Court's
2 standing Order, Plaintiff has submitted the Settlement Agreement under seal as
3 well as the attached declaration of counsel.

4 The Parties agree that this Court can proceed to dismiss this Action entirely
5 with prejudice as to the Named Plaintiff and without prejudice as to the Putative
6 Class alleged in the complaint.

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8 Respectfully submitted this June 25, 2019

9 By: s/Todd M. Friedman, Esq.
10 TODD M. FRIEDMAN
11 Attorney for Plaintiffs

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13 By: s/Genevieve Bradley
14 GENEVIEVE BRADLEY
15 Attorneys for Defendant,
16 FREEPORT VENTURES, LLC.
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¹ Federal Rule of Civil Procedure 23(e) states “[t]he claims, issues or defenses of a certified class may be settled, voluntarily dismissed, or compromised only with the Court’s approval.

1 Filed electronically on this 25th Day of June, 2019, with:

2 United States District Court CM/ECF system

3
4 Notification sent electronically via the Court's ECF system to:

5 Honorable Josephine L. Staton
6 United States District Court
7 Central District of California

8 And all attorneys on ECF.

9
10 This 25th Day of June, 2019.

11 s/Todd M. Friedman, Esq.
12 TODD M. FRIEDMAN